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Attorney for Defendant TRAN

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THE UNITED STATES OF AMERICA,

Plaintiff,

vs.

HUY NGOC TRAN,
Aka "Tony."

Defendant.

2:20-cr-00301-RFB-BNW
(First Request)

STIPULATION TO CONTINUE SENTENCING

IT IS HEREBY STIPULATED AND AGREED, by Defendant HUY NGOC TRAN ("TRAN"), by and through his attorney, LANCE A. MANINGO, and the United States of America, by and through JACOB H. OPERSKALSKI, Assistant United States Attorney, that the Sentencing hearing currently scheduled for September 8, 2022, at 10:00 a.m. be vacated and continued to a minimum of sixty (60) days, to a date and time convenient for this Court.

This Stipulation is entered into for the following reasons:

1. TRAN and his counsel require additional time to prepare for the sentencing hearing, including time to evaluate and address the contents of the Presentence Investigation Report, prepare an effective Sentencing Memorandum, and have time to receive potential exhibits from TRAN's family in support of his Sentencing Memorandum. A continuance of Sentencing will facilitate TRAN's preparation for the hearing.

2. The Government does not object to a continuance.

3. TRAN does not object to a continuance.

4. The denial of this request for a continuance could result in a miscarriage of justice; and

5. This is the first request for a continuance of the sentencing date in this case.

RESPECTFULLY SUBMITTED this 30th day of August, 2022.

By: /s/ Lance Maningo
LANCE A. MANINGO
Attorney for Defendant WASHINGTON

By: /s/ Jacob Operskalski
JACOB H. OPERSKALSKI
Attorney for United States

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THE UNITED STATES OF AMERICA,

Plaintiff,

vs.

2:20-cr-00301-RFB-BNW
(First Request)

HUY NGOC TRAN,
Aka "Tony.",

Defendant.

FINDINGS OF FACTS

Based upon the pending Stipulation of the parties, and good cause appearing therefore,
the Court finds that:

This Stipulation is entered into for the following reasons:

1. TRAN and his counsel require additional time to prepare for the sentencing hearing, including time to evaluate and address the contents of the Presentence Investigation Report, prepare an effective Sentencing Memorandum, and have time to receive potential exhibits from TRAN's family in support of his Sentencing Memorandum. A continuance of Sentencing will facilitate TRAN's preparation for the hearing.
2. The Government does not object to a continuance.
3. TRAN does not object to a continuance.
4. The denial of this request for a continuance could result in a miscarriage of justice; and
5. This is the first request for a continuance of the sentencing date in this case.

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CONCLUSIONS OF LAW

The ends of justice are served by granting the requested continuance.

ORDER

IT IS THEREFORE ORDERED that sentencing in this matter currently scheduled for September 8, 2022, at 10:00 a.m. be vacated and continued to November 7, 2022 at 10:00 AM in the above-noted Court.

DATED this 1st day of September, 2022.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

Respectfully submitted by:

 **MANINGO LAW**
EST. 2002

By: /s/ Lance Maningo
Lance A. Maningo
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400 South 4th Street, Suite 650
Las Vegas, Nevada 89101
Attorney for Defendant TRAN